

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

INTEL CORPORATION

Movant,

v.

FORTRESS INVESTMENT GROUP LLC

Respondent.

Miscellaneous No. 1:19-mc-23

**DECLARATION OF OLGA MUSAYEV IN SUPPORT OF
INTEL CORPORATION'S MOTION TO COMPEL PRODUCTION OF
DOCUMENTS PURSUANT TO SUBPOENA**

I, Olga Musayev, declare:

1. I am an associate at Wilmer Cutler Pickering Hale and Dorr LLP, and counsel for Intel Corporation ("Intel") in *VLSI Technology LLC v. Intel Corporation*, No. 1:18-cv-00966 (D. Del.) ("Delaware Litigation"). I provide this declaration in support of Intel's Motion to Compel Production of Documents Pursuant to Subpoena. If called as a witness, I could testify to the following based on my personal knowledge.

2. Attached hereto as **Exhibit 1** is a true and correct copy of the Complaint in *VLSI Technology LLC v. Intel Corporation*, No. 5:17 cv-05671 (N.D. Cal.) ("California Litigation"), that VLSI Technology LLC ("VLSI") filed on October 2, 2017 (Dkt. 1).

3. Attached hereto as **Exhibit 2** is a true and correct copy of Intel's Notice of Subpoena to Fortress Investment Group LLC ("Fortress") that Intel served in the California Litigation on December 28, 2017.

4. Attached hereto as **Exhibit 3** is a true and correct copy of Fortress's Objections and Responses to Intel's Subpoena to Fortress in the California Litigation, dated January 11, 2018.

5. Attached hereto as **Exhibit 4** is a true and correct copy of Fortress's Supplemental Objections and Responses to Intel's Subpoena to Fortress in the California Litigation, dated January 19, 2018.

6. Attached hereto as **Exhibit 5** is a true and correct copy of the Declaration of Michael Stolarski in Support of VLSI's Opposition to Intel's Motion to Transfer Venue, filed by VLSI in the Delaware Litigation on September 4, 2018 (Dkt. 24).

7. Attached hereto as **Exhibit 6** is a true and correct copy of VLSI's Certificate of Formation, dated June 27, 2016.

8. Attached hereto as **Exhibit 7** is a true and correct copy of the U.S. Patent and Trademark Office assignment abstracts of title for the patents asserted in the California Litigation.

9. Attached hereto as **Exhibit 8** is a true and correct copy of the Joint Stipulated Case Schedule, Case Management Orders, and Order entered in the California Litigation on January 19, 2018 (Dkt. 50).

10. Attached hereto as **Exhibit 9** is a true and correct copy of VLSI's Disclosure Statement Pursuant to Federal Rule of Civil Procedure 7.1 and Certification as to Non-Party Interested Entities or Persons Pursuant to Civil Local Rule 3-15 that VLSI filed in the California Litigation on October 2, 2017 (Dkt. 4).

11. Attached hereto as **Exhibit 10** is a true and correct copy of a February 13, 2018 letter from Amanda Major, counsel for Intel, to Dino Hadzibegovic, counsel for Fortress.

12. Attached hereto as **Exhibit 11** is a true and correct copy of a December 9, 2018 email from Liv Herriot, counsel for Intel, to counsel for VLSI and Fortress.

13. Attached hereto as **Exhibit 12** is a true and correct copy of an email chain that includes a December 18, 2018 email from Liv Herriot, counsel for Intel, to Dominic Slusarczyk, counsel for VLSI and Fortress.

14. Attached hereto as **Exhibit 13** is a true and correct copy of a March 28, 2018 letter from Amanda Major, counsel for Intel, to Robin Curtis, counsel for Fortress.

15. Attached hereto as **Exhibit 14** is a true and correct copy of an April 6, 2018 letter from Robin Curtis, counsel for Fortress, to Amanda Major, counsel for Intel.

16. Attached hereto as **Exhibit 15** is a true and correct copy of an April 24, 2018 letter from Amanda Major, counsel for Intel, to Robin Curtis, counsel for Fortress.

17. Attached hereto as **Exhibit 16** is a true and correct copy of a May 2, 2018 letter from Robin Curtis, counsel for Fortress, to Amanda Major, counsel for Intel.

18. Attached hereto as **Exhibit 17** is a true and correct copy of an August 30, 2018 letter from Amanda Major, counsel for Intel, to Dominik Slusarczyk, counsel for Fortress.

19. Attached hereto as **Exhibit 18** is a true and correct copy of a September 25, 2018 letter from Amanda Major, counsel for Intel, to Dominik Slusarczyk, counsel for Fortress.

20. Attached hereto as **Exhibit 19** is a true and correct copy of an email chain that includes an October 9, 2018 email from Amanda Major, counsel for Intel, to Dominik Slusarczyk, counsel for Fortress.

21. Attached hereto as **Exhibit 20** is a true and correct copy of an October 30, 2018 letter from Amanda Major, counsel for Intel, to Dominik Slusarczyk, counsel for Fortress.

22. Attached hereto as **Exhibit 21** is a true and correct copy of a January 11, 2019 letter from Dominik Slusarczyk, counsel for Fortress, to Amanda Major, counsel for Intel.

23. Attached hereto as **Exhibit 22** is a true and correct copy of VLSI's Supplemental Initial Disclosures in the California litigation, dated March 8, 2018.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: January 15, 2019



Olga Musayev